



## **Georgia Access to Medical Cannabis Commission**

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### **GMCC Proposed Rules related to cannabis waste and disposal**

The Commission's Proposed Rules are available at:

[www.gmcc.ga.gov/rules-georgia-law/commission-rules](http://www.gmcc.ga.gov/rules-georgia-law/commission-rules)

#### **(PROPOSED) Rule 351-4-.05 Production Operations**

- (8) A production licensee shall ensure that regulated cannabis waste is:
  - (a) Stored in a securely locked and enclosed container that is securely fastened to a permanent structure so that the receptacles cannot be moved;
  - (b) Located in a restricted access area designated for regulated cannabis waste; and
  - (c) Disposed, documented, and managed in accordance with all local, state, and federal regulations.
- (9) Regulated cannabis waste shall be disposed by:
  - (a) Rendering all regulated cannabis waste unusable and unrecognizable or irretrievable prior to the waste leaving the premises; or
  - (b) Transferring the regulated cannabis waste securely to a processor for recycling, reuse, or composting.
- (10) A production licensee shall establish, maintain, and follow standard operating procedures for production operations, which must include processes for the following:
  - (f) Proper disposal of any:
    - (i) Wastewater;
    - (ii) Spent solvents;
    - (iii) Any other by-product resulting from the manufacturing of regulated cannabis; and
    - (iv) Outdated, damaged, deteriorated, misbranded, or adulterated regulated cannabis.
- (11) A production licensee shall establish and implement a product waste management plan that describes, at a minimum:
  - (a) Procedures for retrieving or receiving product waste from the dispensing licensees; and
  - (b) Record maintenance and retention procedures for product waste records.

## **PLANT WASTE**

All regulated cannabis plant waste is disposed of in a manner that ensures safety, security and no illicit market diversion. Nation-wide, cannabis regulatory agencies including Georgia require cannabis waste to be rendered “unusable and unrecognizable” before disposal. In Georgia, the Commission has not required its licensees to combine plant waste with soil to meet the requirement for cannabis to be “unrecognizable and irretrievable.” In many states, this requirement mandates grinding, crushing, or compacting the regulated cannabis waste and incorporating it with 50% other inert types of waste (e.g. paper, plastic, cardboard, food, soil, sawdust, etc.) This requirement can make sustainable disposal in accordance with solid waste regulations difficult as it doubles the landfill footprint. GMCC does not require a 50% mix with non-cannabis waste for low-THC plant components (stalks, stems, and rootballs) if conducting composting, anaerobic digestion, pyrolyzing into biochar, or biomass gasification. This still supports safe and secure plant waste management while reducing barriers to more sustainable waste handling options for cannabis plant waste.

In accordance with state law, regulations, and approved disposal plans cannabis plant waste can be:

- Disposed of at a solid waste disposal facility that has a certificate of designation from the appropriate governing body; or
- Incinerated; or
- Composted on-site until sufficiently unrecognizable; or
- Composted waste can be reintroduced into cultivation operations.

## **CONSUMER PACKAGING WASTE**

Cannabis packaging is most often small plastic recyclable containers that must meet child-resistant regulations. Reuse and recycling is highly encouraged through packaging take-back programs at dispensary locations for increased bulk recycling or reuse. The reusable nature of cannabis packaging greatly reduces packaging waste.

## **HAZARDOUS WASTE**

Hazardous waste must be disposed of in a manner consistent with federal, state and local laws, regulations, rules or other requirements. Hazardous wastes generated by cannabis facilities may include, but are not limited to, spent organic solvents and refining chemicals, used reactants, compressed gasses or aerosols, bulk or residual fertilizers, cleaning solutions, and universal wastes (mercury-containing materials, batteries, etc.). Before disposing of the waste, cannabis businesses must determine which regulations apply, including making hazardous waste determinations. Consistent with any industrial business that generates hazard waste, cannabis facilities must properly dispose of hazardous waste by use of a registered hazardous waste transporter. The hazardous waste transporter must transport the hazardous waste to a hazardous waste treatment, storage and disposal facility (TSDF).

## **PRODUCT WASTE**

If a product in final form is returned or recalled it may be remediated or disposed of depending upon the product and the circumstance. Production licensees may be able to remediate or “remanufacture” recalled products, which can then be tested for safety. If disposal is required, all pharmaceutical waste in Georgia is handled through state licensed Reverse Distributors. Georgia has six or more Reverse Distributors that are also DEA registered to handle returned or recalled medical cannabis products.